

EQUALITY IMPACT ASSESSMENT

The Equality Impact Assessment (EqIA) form is a template for analysing a policy or proposed decision for its potential effects on individuals with protected characteristics covered by the Equality Act 2010.

The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not

The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/fait, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protect characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision-making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA, once submitted, will become a public document, published alongside the minutes and record of the decision.

Please read the Council's Equality Impact Assessment Guidance before beginning the EqIA process.

1. Responsibility for the Equality Impact Assessment

Name of proposal	Bruce Grove West Green Low Traffic Neighbourhood
Service area	Environment and Resident Experience
Officer completing assessment	Naima Ihsan
Equalities/ HR Advisor	Jessica Russell
Cabinet meeting date (if applicable)	10 December 2024

Director/Assistant Director	Barry Francis / Mark Stevens
-----------------------------	------------------------------

2. Summary of the proposal

Please outline in no more than 3 paragraphs

- *The proposal which is being assessed*
- *The key stakeholders who may be affected by the policy or proposal*
- *The decision-making route being taken*

In December 2021, Cabinet approved an 18-month trial of Bounds Green LTN, St Ann's LTN and Bruce Grove West Green LTN, and a range of complementary measures including new pedestrian crossings, cycle hangars and six trial School Streets. The LTNs were introduced on a trial basis, using experimental traffic orders (ETOs), the very purpose of which was to allow all stakeholders to see the scheme in operation allowing time to reflect on whether the scheme was working and delivering what it was expected to before taking a decision on whether to make alterations, revoke the ETO or make the changes permanent.

Low traffic neighbourhoods (LTNs) form a key part of Haringey Council's adopted Walking and Cycling Action Plan¹ which sets out how to make the borough a more attractive place for residents, businesses and visitors, by enabling more walking, wheeling², cycling and public transport trips, whilst reducing motor traffic overall. Motor vehicle-centric street design disproportionately impacts those with the lowest levels of motor vehicle access and household incomes³ and, by introducing well-designed LTNs, we can create streets that enable more walking, wheeling and cycling for those who benefit the least from traditional, passive traffic management approaches. In addition, research has shown that LTNs are able to reduce car ownership per household over time⁴, leaving more traffic capacity for those who have little option but to drive local trips.

Exemptions have been available since the launch of the LTN and, following the interim review, were extended so that all Blue Badge holders living in Haringey could apply to drive through most of the traffic filters that are enforced by camera. Previously, exemptions were available only for Blue Badge holders who lived within or on the immediate boundary of the LTN. The majority of exemption permits have been issued to motorists who applied under the 'Haringey Blue Badge holder' (89%) or 'Individual Circumstances' (8%) criteria. In those cases, exemptions are generally valid across all three trial LTNs (where the traffic filter displays the relevant permit code (X1, X2, X3)).

¹ <https://new.haringey.gov.uk/streets-roads-travel/haringey-streets-people/our-walking-cycling-action-plan>

² 'Wheeling' – in this context meaning anyone using a mobility aid such as a wheelchair, wheeled walking aid (e.g. Rollator) or 3 or 4-wheeled mobility scooter; 'wheeling' also includes others such as children using push-scooters and parents/carers using buggies and pushchairs.

³ Inequalities in self-report road injury risk in Britain: A new analysis of National Travel Survey data, focusing on pedestrian injuries
<https://www.sciencedirect.com/science/article/pii/S2214140517306308>

⁴ <https://findingspress.org/article/17128-low-traffic-neighbourhoods-car-use-and-active-travel-evidence-from-the-people-and-places-survey-of-outer-london-active-travel-interventions>

Following extensive engagement and research, the Council developed and, in July 2022, implemented a Low Traffic Neighbourhood Exemptions Criteria and Application Process, which allows certain groups or people with specific characteristics to bypass the filters. Further details can be found by accessing this link:

<https://www.haringey.gov.uk/parking-roads-and-travel/roads-and-streets/haringey-streets-people/low-traffic-neighbourhood-exemptions>.

The key stakeholders are:

Everyone living in or who travels through the Bruce Grove West Green LTN area, surrounding areas and would be affected by the LTN. Vehicle access to all properties within the area will be maintained under the LTN, albeit the schemes will result in changes to motor vehicle access routes for some drivers. The LTN aims to deliver multiple benefits, of varying degrees, for various non-motorised users, as described throughout the Equality Impact Assessment (EqIA) report.

The proposed decision is to approve the making of traffic orders that will permanently implement the experimental traffic scheme known as the Bruce Grove West Green Experimental Low Traffic Neighbourhood (LTN). This proposal is scheduled to be presented to the Cabinet on 10th December 2024.

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these

This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.

Protected group	Service users	Staff
Sex	<ul style="list-style-type: none"> Census 2021 Haringey borough profile data <u>State of the Borough – September 2023</u> 	N/A
Gender Reassignment	<ul style="list-style-type: none"> Census 2021 Haringey borough profile data <u>State of the Borough – September 2023</u> 	N/A
Age	<ul style="list-style-type: none"> Census 2021 Haringey borough profile data <u>State of the Borough – September 2023</u> 	N/A
Disability	<ul style="list-style-type: none"> Census 2021 Haringey borough profile data <u>State of the Borough – September 2023</u> 	N/A
Race & Ethnicity	<ul style="list-style-type: none"> Census 2021 Haringey borough profile data <u>State of the Borough – September 2023</u> 	N/A
Sexual Orientation	<ul style="list-style-type: none"> Census 2021 Haringey borough profile data <u>State of the Borough – September 2023</u> 	N/A
Religion or Belief (or No Belief)	<ul style="list-style-type: none"> Census 2021 Haringey borough profile data <u>State of the Borough – September 2023</u> 	N/A

Protected group	Service users	Staff
Pregnancy & Maternity	<ul style="list-style-type: none"> • Census 2021 • Haringey borough profile data • <u>State of the Borough – September 2023</u> 	N/A
Marriage and Civil Partnership	<ul style="list-style-type: none"> • Census 2021 • Haringey borough profile data • <u>State of the Borough – September 2023</u> 	N/A

Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?

Sex

The Bruce Grove West Green LTN project spans Bruce Grove, West Green and Tottenham Central wards. For that reason, information from the Census 2021 has been gathered on each protected group for each of these wards and for Haringey borough.

Gender	West Green ward (%)	Tottenham Central	Bruce castle ward (%)	LB Haringey of (%)	London (%)
Male	48.1% ⁵	49.2%	47.9% ⁶	48.1% ⁷	48.5% ⁸
Female	51.9% ⁹	50.8%	52.1% ¹⁰	51.9% ¹¹	51.5% ¹²

Tottenham Central ward has 49.2% of men and a slightly higher proportion of women at 50.8%.

LB Haringey has 48.1% of men and 51.9% of women. Haringey's men to women ratio is in line with the rest of London.

Across Greater London, research undertaken by TfL shows walking is the most used type of transport by women (95 per cent walk at least once a week).¹³ Women are also more likely to use buses than men (63% compared with 56%) but are less likely to use other types of transport including the Tube (38% of women compared with 43% of men). Men (42%) are likely to drive a car than women (33%) once a week, with women (51%) more likely to use a car as a passenger once a week compared to men (37%).¹⁴

It is important to recognise that women are more likely than men to be travelling with buggies and/or shopping, and this can affect transport choices.¹⁵

Women aged 17 or over who are living in London are less likely than men to have a full driving licence (58% compared with 72%) or have access to a car (63% of all women compared with 66% of all males).¹⁶ These factors are likely to be related to the frequency of car use as a driver.

⁵ [Haringey ward profiles | Haringey Council](#)

⁶ [Haringey ward profiles | Haringey Council](#)

⁷ [2021 Census Profile for areas in England and Wales - Nomis](#)

⁸ [Haringey ward profiles | Haringey Council](#)

⁹ [Haringey ward profiles | Haringey Council](#)

¹⁰ [Haringey ward profiles | Haringey Council](#)

¹¹ [2021 Census Profile for areas in England and Wales - Nomis](#)

¹² [Haringey ward profiles | Haringey Council](#)

¹³ [Travel in London: Understanding our diverse communities 2019](#)

¹⁴ [Travel in London: Understanding our diverse communities 2019](#)

¹⁵ [Travel in London: Understanding our diverse communities 2019](#)

¹⁶ [Travel in London: Understanding our diverse communities 2019](#)

Women are more likely to use the bus than men. As many public transport journeys start or end on foot or cycle, the improvements the scheme aims to deliver in terms of safety and convenience to these networks will improve their access to public transport services.

The London Travel Demand Survey looks at attributes of those London residents who cycle. In 2022/23, it was reported that approximately 18% of women cycled at least once a week.¹⁷ 79% of women in London report being able to ride a bike, compared with 91% of males¹⁸. Increasing residents' access to favourable cycling conditions is likely to encourage women (who lag behind men) to learn how to ride a bike, particularly due to the higher number of trips they make daily compared to men, as well as their role in taking children to and from educational and recreational facilities. The proposals would reduce a significant barrier to cycling.

Reduced volumes of motor vehicle traffic in LTNs create significantly quieter environments which can heighten the apprehension of threat. This perception particularly impacts women making trips by foot or bicycle, as part of a public transport journey or a trip on its own. There is some concern that this perceived risk impacts women's willingness to make trips by active travel modes after dark although, during the day, LTNs may create more pedestrians on the street and increase the feeling of safety. In contrast, an academic report¹⁹ suggested a positive improvement in the measured crime rate after the introduction of LTNs. The report examined the impact on street crime after introducing LTNs in Waltham Forest which was associated with a 10% decrease in total street crime, with significant decreases in violence and sexual offences. The potential causative factors that result in reduced crime are not identified in the report, yet the outcome demonstrates a potential benefit. However, women tend to share taxi services late at night to get home safely. The LTN may increase travel times and cost between drop-offs.

Reduction of through-traffic will reduce the risk of road traffic collisions, which would benefit pedestrians particularly pregnant women with infants and/or young children. This will also provide benefits to women travelling with prams who require additional time to navigate kerbs when crossing the street. Quieter streets also mean that those travelling with prams can use the road if they choose to circumvent obstructions on the pavement (e.g. if the pavement is too narrow to navigate due to bins).

Air quality exposure is worse²⁰ inside of a vehicle than outside of it, so all groups, including those with protected characteristics, will benefit from increased active travel by lower exposure to poor air quality. They will also benefit from the other positives of active travel, such as the associated health benefits.

Gender Reassignment

¹⁷ [Travel in London 2023 - Annual Overview](#)

¹⁸ <http://content.tfl.gov.uk/attitudes-to-cycling-2014-report.pdf>

¹⁹ <https://findingspress.org/article/19414-the-impact-of-introducing-a-low-traffic-neighbourhood-on-street-crime-in-waltham-forest-london/>

²⁰ <https://www.london.gov.uk/sites/default/files/2023-09/In-vehicle%20exposure%20to%20traffic%20and%20road-generated%20air%20pollution.pdf>

There is no data showing that the LTN disproportionately affects people as a result of their sexual orientation.

Age

The percentages below provide a snapshot of the age distribution in each ward from the Census 2021, highlighting the diversity in age groups across these ward areas.²¹

Age Group	West Green Ward	Tottenham Central Ward	Bruce Castle Ward
0-4 years	7%	7%	7%
5-9 years	6%	6%	6%
10-14 years	6%	6%	6%
15-19 years	5%	5%	5%
20-24 years	8%	7%	7%
25-29 years	8%	8%	8%
30-34 years	9%	9%	9%
35-39 years	9%	8%	9%
40-44 years	7%	7%	7%
45-49 years	7%	6%	7%
50-54 years	6%	6%	6%
55-59 years	6%	5%	6%
60-64 years	5%	5%	5%
65-69 years	4%	4%	4%
70-74 years	3%	3%	3%
75-79 years	3%	2%	3%
80-84 years	2%	2%	2%

²¹ [Ward data, England and Wales: Census 2021 - Office for National Statistics](#)

85+ years	1%	1%	1%
------------------	----	----	----

With 20-22% of the population in these wards being children, the reduced traffic over time and safer streets can encourage outdoor play and walking or cycling to school, contributing to healthier lifestyles and reducing the risk of road accidents.

With 19-20% of the population in the 45-59 age group, the LTN can offer a quieter and safer environment, which is beneficial for those who may be more vulnerable to traffic-related stress and pollution. Enhanced pedestrian infrastructure can also support more active and independent lifestyles.

Senior Population (60+ years): Seniors, making up 16-18% of the population, can greatly benefit from the LTN's focus on reducing traffic and improving pedestrian safety. Accessible and well-maintained pathways can facilitate mobility for older adults, promoting independence and reducing the risk of accidents.

People aged between 20 and 29 years old are more likely to be killed or seriously injured than those in other age groups and the number of children killed or seriously injured in cars increased as recently as 2016. Black, Asian, and non-white Londoners are more at risk from motor vehicle injury, with children in this group being on average 1.5 times more likely to be killed or seriously injured on the roads than white children ²².

Alongside road danger, air pollution is an invisible but acute threat to children's health. Around 1 in 3 babies are growing up in areas of the UK with unsafe levels of particulate matter – that's nearly 270,000 babies under the age of 1 in the UK²³. Toxic exhaust pipe emissions damage children's growth and leave them with lasting health problems (it should be noted that harmful particulate matter is also produced by tyres and brake linings which includes those fitted to electrically powered motor vehicles). In 71% of UK towns and cities, children are breathing unsafe levels of air pollution²⁴.

Air quality exposure is worse²⁵ inside of a vehicle than outside of it, so all groups, including those with protected characteristics, will benefit from increased active travel by lower exposure to poor air quality. They will also benefit from the other positives of active travel, such as the associated health benefits. Data²⁶ on air quality shows that it is particularly harmful for children and elderly people.

Improvements in air quality are likely to particularly benefit infants and children who are more vulnerable to breathing in polluted air than adults due to their airways being in development, and their breathing being more rapid than adults. Children's faces are usually closer to the ground than those of adults, as children in prams stay closer to the direct source of pollutions and fumes. The implementation of the scheme may alter

²² Vision Zero Action Plan – Taking forward the Mayor's Transport Strategy <https://content.tfl.gov.uk/vision-zero-action-plan.pdf>

²³ <https://downloads.unicef.org.uk/wp-content/uploads/2019/02/Healthy-Air-for-Every-Child-A-Call-for-National-Action-1.pdf>

²⁴ Unicef – Healthy Air for Every Child <https://downloads.unicef.org.uk/wp-content/uploads/2019/02/Healthy-Air-for-Every-Child-A-Call-for-National-Action-1.pdf>

²⁵ <https://www.london.gov.uk/sites/default/files/2023-09/In-vehicle%20exposure%20to%20traffic%20and%20road-generated%20air%20pollution.pdf>

²⁶ [Young and old, air pollution affects the most vulnerable](#)

some car journey routes and times for a portion of parents with infants and/or young children who may find it more difficult to walk or cycle, and therefore prefer the use of door-to-door transport services such as private cars or taxis.

The proposal improves the ability to move through the area walking, using a mobility aid, adapted cycle or wheelchair. Due to reduced traffic, it makes it easier to cross the road. Some older people with certain conditions may be more reliant on travel by motor vehicle and in some cases journey times may increase as a result of the proposal.

The LTN aims to benefit these groups by improving air quality at schools within the LTN, improving road safety, and reducing exposure levels to pollutants.

Disability

Census 2021 data on car ownership levels for disabled people in West Green, Bruce Castle, and Tottenham Central wards provides these key points:

Ward	No Car or Van	1 Car or Van	2 or More Cars or Vans
West Green	55%	35%	10%
Bruce Castle	52%	38%	10%
Tottenham Central	58%	32%	10%

These figures indicate that a higher percentage of disabled households do not own a car or van compared to the general population in these wards. This suggests that disabled residents may rely more on public transport, walking, or other modes of travel. Therefore, any changes should consider the accessibility needs of disabled individuals to ensure they are not disproportionately affected.

The **Pave The Way** report by Transport for All²⁷ highlights significant accessibility issues in the current public realm, transport systems, and road networks for disabled people. It emphasizes that these barriers limit where disabled individuals can travel and the means by which they can do so. The report also discusses how low traffic neighbourhoods (LTNs) can have both positive and negative impacts on disabled people. While LTNs can reduce traffic and pollution, making active travel more accessible, they can also create new barriers if not designed inclusively. Low traffic neighbourhoods may therefore have positive impacts for some disabled people, particularly those who are able to benefit from measures that make active travel more accessible or whose journeys were affected by the higher levels of traffic in their local area before LTNs were introduced.

²⁷ [Pave-The-Way-full-report.pdf](#)

Exemptions have been available since the launch of the LTN and, following the interim review, were extended so that all Blue Badge holders living in Haringey could apply to drive through most of the traffic filters that are enforced by camera. Previously, exemptions were available only for Blue Badge holders who lived within or on the immediate boundary of the LTN. The majority of exemption permits have been issued to motorists who applied under the 'Haringey Blue Badge holder' (89%) or 'Individual Circumstances' (8%) criteria. In those cases, exemptions are generally valid across all three trial LTNs (where the traffic filter displays the relevant permit code (X1, X2, X3)).

Unsurprisingly, most applications are made by people who live within the LTN. However, of those who live outside an LTN, there is a significantly larger proportion of applicants living in the east of the borough than in the west; this aligns with health and deprivation data ²⁸ that shows that communities in the east of the borough have higher levels of long-term health conditions and, therefore, are more likely to be eligible for an exemption under the Blue Badge or Individual Circumstance criteria.

Throughout the LTN engagement, several groups and organisations providing support and information around living with disabilities have been contacted and invited to participate in the Council's engagements. An LTN inclusion group was set up for individuals to voice their concerns and were invited to input into the disabled and carers survey. It was key to involve these groups to ensure the scheme is accessible for people with different disabilities.

Disabled and Carers Survey

A survey for disabled residents and/or carers in the LTN area was developed to explore some of the specific needs and suggestions from these groups. In total, 365 responses were received to the Disabled People's Survey.

Most respondents reported that they had a disability (80.8%), while 22.5% had a child or family member with a disability. 1.1% of respondents stated that they had no disability, while 1.1% preferred not to say. Respondents could select multiple answer options, for instance in cases where a person had a disability themselves and had a child or family members with a disability.

When asked about where the respondent themselves, or their disabled family member(s), lived in relation to the LTN, just over 3 in 10 respondents reported they and/or their family member living in another part of Haringey (33.9%), followed by within the Bruce Grove West Green LTN (28.8%).

Respondents were asked to provide information on the general nature of their disability. The majority of respondents stated that they had a physical disability or health condition (76.2%), followed by long-term health condition/hidden health condition (40.9%). Other commonly reported responses included chronic illness (23.8%), mental health condition (18.0%) and learning disability (11.6%). As above, respondents could select multiple responses, in instances where a person has multiple disabilities.

²⁸ [Haringey annual public health report 2023](#)

Among those that reported either having a disability themselves, or who had a family member with a disability, just over 9 in 10 (91.7%) reported that their mobility was affected as a result.

Respondents were also asked to provide information on the mobility aids they or their family members used. Most responses stated that they used a mobility walker (94.8%), followed by a walking stick/cane (54.1%). 12.2% reported that they do not use a mobility aid.

Respondents were asked whether they or their family member have a Blue Badge. Over 9 out of 10 respondents reported that they had a Blue Badge (92.4%).

The most commonly reported method of travel was motor vehicle (car, van, moped or motorcycle), which 78.7% of respondents reported using. Other frequently reported methods of travel include bus (25.4%), walking or wheeling (20.7%), train or underground (16.3%) and private hire vehicle (11.9%).

CommonPlace Survey

Analysis of CommonPlace survey results in Bruce Grove West Green shows that the majority of respondents did not have a disability or long-term health condition (84.9%).

- Of those who reported having a disability, nearly three tenths had a long-term health condition or hidden health condition (28.0%), whilst two tenths reported a physical disability (21.2%).
- Nearly three tenths of respondents had a disability which affected their mobility (29.2%).

Table 1: Do you have a disability?

Category	Count	Percentage
No	1170	84.9
Yes	208	15.1
Base	1378	100.0

Of the respondents who reported having an LTN exemption, a third reported holding Blue Badges in Haringey (27.3%), while less than a tenth (7.9%) reported having exemptions due to individual circumstances.

Table 2: If you have an LTN exemption, under which criteria was it granted?

Category	Count	Percentage
Blue Badge holder - Haringey	62	27.3
Individual circumstance	18	7.9
Urgent safety matter	4	1.8
Blue Badge holder - Enfield	2	0.9
Emergency services	2	0.9

Council refuse and cleansing	1	0.4
SEND transport	1	0.4
Disability transport	1	0.4
Prefer not to say	136	59.9
Base	227	100.0

1115 respondents provided a total of 1387 comments regarding any changes they think should be implemented regarding the exemptions. The most common themes related to allowing exemptions for residents, removal of the LTN, and allowing exemptions for those who are disabled or carers.

- Most comments relating to 'Improve access/allow exemptions – residents' suggested that all residents within the LTN should be exempt from restrictions on their travel.
- Comments referring to 'Remove the LTN' further suggest that the trial should be removed, citing the negative impacts to their journey times from increased congestion on surrounding roads.

Comments relating to 'Improve access/allow exemptions - disabled people/carers' mostly refer to providing exemptions for those who are elderly and have limited mobility, those with disabilities, and carers of more vulnerable residents. Comments also suggest all Blue Badge holders should be exempt from LTN restrictions

Race & Ethnicity

Haringey is a highly diverse borough with a rich cultural and linguistic landscape:

- Approximately 67.1% of Haringey's population are from an ethnic minority or a non-White British group²⁹. This includes:
 - Black ethnic groups: 16.5%
 - Asian ethnic groups: 10.3%
 - Other ethnic groups: The remaining percentage includes mixed and other ethnicities.
- White Other: Around 26% of residents identify as "White Other," reflecting the significant presence of European and other non-British white communities³⁰.
- Languages Spoken: Over 180 languages are spoken in Haringey, highlighting its linguistic diversity³¹.

This diversity underscores the importance of inclusive and accessible community planning and services to cater to the needs of all residents.

²⁹ [How life has changed in Haringey: Census 2021](#)

³⁰ [How life has changed in Haringey: Census 2021](#)

³¹ [Haringey Census Demographics United Kingdom](#)

While specific ward-level data for Black, Asian, Minority Ethnic (BAME) car ownership in Haringey is not readily available, the general trends can be inferred from broader datasets:

- **No Car or Van:** Approximately 45-50% of BAME households in urban areas like Haringey do not own a car or van³².
- **1 Car or Van:** Around 35-40% of BAME households own one car or van³³.
- **2 or More Cars or Vans:** About 10-15% of BAME households own two or more cars or vans³⁴.

BAME communities may rely more on public transport, making it crucial to ensure that the LTN does not disrupt access to these services.

Involving BAME communities in the planning and implementation of LTNs has been essential to address their specific needs and ensure equitable benefits.

By reducing traffic within the LTN areas, Black, Asian and Multi-Ethnic groups residents and those travelling through the LTNs are expected to benefit from improved road safety and improved air quality. The proposal is expected to have positive impacts for some Black, Asian and Multi-Ethnic groups. Black, Asian and Multi-Ethnic groups are over-represented in indices of deprivation and more likely to be exposed to transport-related harmful impacts, such as traffic collisions and poor air quality and health inequalities related to inactive lifestyles.

With the aim of reducing traffic within the LTN areas, Black, Asian and Multi-Ethnic groups residents and those travelling through the LTNs are expected to benefit from improved road safety and improved air quality over time.

Data shows that BAME individuals are more likely³⁵ to be exposed to poor air quality in London than those not from BAME groups. We also know that poor air quality is more common in the south and east of Haringey, whilst the proportion of BAME residents is also higher in the east of Haringey. Therefore, we can surmise that BAME communities are presently more exposed to poor air quality in Haringey than non-BAME groups.

Air quality exposure is worse³⁶ inside of a vehicle than outside of it, so all groups, including those with protected characteristics, will benefit from increased active travel by lower exposure to poor air quality. They will also benefit from the other positives of active travel, such as the associated health benefits.

Making the Bruce Grove West Green LTN permanent will therefore benefit these groups by improving air quality in areas with disproportionate numbers of ethnic minorities.

Sexual Orientation

³² [Car or van availability - Office for National Statistics](#)

³³ [Car or van availability - Office for National Statistics](#)

³⁴ [Car or van availability - Office for National Statistics](#)

³⁵ <https://www.london.gov.uk/press-releases/mayoral/bame-and-poorer-londoners-face-air-quality-risk>

³⁶ [In-car air pollution](#)

There is no data showing that the LTN will disproportionately affect people as a result of their sexual orientation.

Religion & Belief (or No Belief)

It is important that the specific views of the range of religious groups and communities are included in the consultation process.

There are some established faith/religious groups in the area, and they were contacted and invited to take part in the engagement.

Religion/Belief	West Green Ward	Tottenham Central Ward	Bruce Castle Ward	Haringey	London
Christian	45%	47%	46%	44%	48%
Muslim	15%	18%	17%	14%	15%
Hindu	5%	4%	5%	4%	5%
Jewish	1%	1%	1%	2%	2%
Buddhist	2%	2%	2%	2%	1%
Sikh	1%	1%	1%	1%	1%
Other Religion	2%	2%	2%	2%	2%
No Religion	25%	22%	23%	27%	21%
Religion Not Stated	4%	3%	3%	4%	5%

Religious identity in West Green ward³⁷ largely follows the wider borough pattern, with Christianity (45%) the main religion and Islam representing the second largest religion (15.1%). West Green ward has a very small proportion of Jewish residents (1%) compared to LB Haringey more widely (2%). Just under half of Tottenham Central ward residents identify as Christian (47.9%), a higher proportion than the Haringey average (44%). The Muslim community is the second largest in all three wards which is consistent with the wider borough and London.

LTNs can foster a sense of community by reducing traffic and making neighbourhoods more pedestrian-friendly. This can enhance social interactions and community activities, including religious gatherings. Improving conditions for walking and cycling is likely to positively benefit those who attend places of worship on foot, by bicycle or using a mobility scooter. Amenities such as these are generally attended by those who live and work locally. Although it is acknowledged that this scheme is likely to increase some journey times for some worshippers who drive to their place of worship.

Religious commitments can sometimes leave little time for sporting activities, for example, as young Asian Muslims attend mosque after school, they do not have much leisure time as those from non-religious backgrounds as stated in Barriers to Cycling for Ethnic

³⁷ [Religion \(detailed\) - Office for National Statistics](#)

Minorities and Deprived Groups³⁸. Therefore, creating environments that enable and encourage people to cycle more often can lead to exercise being built into their day, rather than them having to go out of their way to achieve it.

Air quality exposure is worse³⁹ inside of a vehicle than outside of it, so all groups, including those with protected characteristics, will benefit from increased active travel by lower exposure to poor air quality. They will also benefit from the other positives of active travel, such as the associated health benefits.

Making the LTN scheme permanent will therefore benefit this protected characteristic.

Pregnancy & Maternity

It is important to ensure the designs are suitable for pregnant women as well as accessible for prams.

Reduction of through-traffic is likely to reduce conflict between different road users overall. This will reduce the risk of road traffic collisions involving pedestrians particularly pregnant women, parents and guardians with young babies. This will also provide benefits to pedestrians travelling with prams who require additional time to navigate kerbs when crossing the street. Quieter streets also mean that those travelling with prams can use the road if they choose to circumvent obstructions on the pavement (e.g. if the pavement is too narrow to navigate due to bins).

The implementation of the scheme may alter some car journey routes and times for a portion of those who are pregnant and for parents with babies who may find it more difficult to walk or cycle, and therefore prefer the use of door-to-door transport services such as private cars or taxis.

Expectant mothers and mothers who have recently given birth may have increased numbers of medical appointments. Where this travel is made by car, some journeys may take slightly longer but, where the journey is walked or cycled through the project area, it is likely to be less polluted and have reduced volumes of traffic. Furthermore, exposure to poor air quality while at home should reduce over time because of mode shift away from private car trips.

There are some established pre/post-natal groups, parent groups and nurseries which were invited to take part in the engagement. They were contacted and encouraged to take part during the pre-LTN consultation and any member of the public was able to respond to the interim and final public consultation.

Air quality exposure is worse⁴⁰ inside of a vehicle than outside of it, so all groups, including those with protected characteristics, will benefit from increased active travel by lower exposure to poor air quality. They will also benefit from the other positives of active travel, such as the associated health benefits.

Marriage and Civil Partnership

³⁸ <http://content.tfl.gov.uk/barriers-to-cycling-for-ethnic-minorities-and-deprived-groups-summary.pdf>

³⁹ <https://www.london.gov.uk/sites/default/files/2023-09/In-vehicle%20exposure%20to%20traffic%20and%20road-generated%20air%20pollution.pdf>

⁴⁰ <https://www.iqair.com/newsroom/in-car-pollution>

There is no data showing that the LTN will disproportionately affect people as a result of this protected characteristic.

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

Please outline which groups you may target and how you will have targeted them

Further information on consultation is contained within accompanying EqIA guidance

The communications and engagement activity undertaken to support the Bruce Grove West Green LTN proposal aligns with the Council's obligations under the Equality Act 2010. The programme took the following steps to ensure those obligations were met :

- The option to request consultation materials in different languages or braille for those who request it;
- Individuals could request printed copies of the materials presented;
- A postal address was provided so individuals who are not able to submit feedback online could still participate.
- Any locations where physical material was available are accessible locations; and
- Translation and sign language options were offered where necessary and possible.

This LTN project has seen unprecedented levels of consultation with three stages of engagement prior to launch, followed by an experimental (trial) scheme that provided everyone the opportunity to see the scheme in operation and comment on their lived experience. Between 23rd August and 20th September 2024, the following consultations were carried out:

- Public consultation – leaflet distributed to approximately 10,000 properties with online questionnaire via the CommonPlace platform.
- Disabled people survey – delivered by email or post to 10,000 Haringey Blue Badge holders and referenced in the other consultation documents.
- Carers survey – communicated through carer networks and referenced in the other consultation documents.
- Email to over 150 key stakeholders

Business perception survey – door-to-door visits of businesses located within and on the immediate boundary of the LTN were conducted from 16th July to 7th August. However, as implied by the title, the purpose of that survey was to ascertain the impact of the LTN on local business, rather than to determine or extract any equalities-related issues.

Responses to the above could be submitted online, or paper copies were available which could be returned via Freepost. Alternative formats and translation services were available and a dedicated phone number and email address were provided for any further assistance.

Communication of the consultation included:

- Paper copies in local libraries
- 150 lamp column wraps
- HPX newsletter
- School newsletter
- Business bulletin
- SEND newsletter
- Digital screens in libraries and council buildings
- Emails to stakeholder and reference groups (local groups, trader groups, faith groups, disability groups, Joint Partnership Board, carer networks, health trust/partners, MPs, statutory bodies and internal teams)
- Enfield Council notified
- Staff bulletin
- Ongoing social media campaign

Taken together, these tools have provided residents with multiple opportunities to provide feedback on the proposals for reducing the traffic in the Bruce Grove West Green area.

A survey (hosted by CommonPlace) ran from 23rd August to 20th September 2024, which provided residents the opportunity to comment on feedback on how the trial has been running so far. This was hosted on the CommonPlace platform and also the project page, allowing continuity for people who previously participated in the early engagement exercises. Residents were also provided with a link to this in the mailshot that was sent to them.

Each engagement stage has included monitoring questions looking to collect:

- Demographic data;
- Information about how participants currently travel around the area.

The survey consultation material (including a leaflet summarising the last stages of engagement) was posted to all the households and premises within the scheme area and adjacent roads. The consultation included the following activities:

- All Haringey Councillors informed;
- On-line and hard copy accessible formats for the leaflet and survey

In addition, a series of lamp post wraps were distributed in locations throughout the Bruce Grove West Green LTN area, and emails were sent to all individuals who participated in the previous stages of engagement via CommonPlace, to encourage them to complete the survey.

The collected data has helped assess the impact of the LTN proposal on various protected groups by:

- Identifying any potential barriers or negative impacts.
- Ensuring that the needs and concerns of different groups are addressed.
- Informing adjustments to the proposal to enhance accessibility and inclusivity.

By targeting these groups and using diverse engagement methods, the Council aims to ensure that the LTN proposal is equitable and considers the needs of all residents, service users, and staff.

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?

The previous EqlA provides an analysis of the previous consultations to date. This section of consultation will only provide analysis of the consultation carried as part of the final stage during Summer 2024.

Five surveys were designed to obtain feedback from a range of stakeholders across each LTN. Each of the surveys were available online, with paper versions available on request. The surveys were available to complete between Friday 23rd August and Friday 20th September 2024.

An online survey (hosted by CommonPlace) was held from 23rd August to 20th September 2024 and showed that traffic speed and volumes were top concerns. The issue raised most frequently was 'traffic speeding', which was mentioned in 54% of comments or agreements. The suggested improvement raised most frequently was 'reduce traffic volumes', which was mentioned in 48% of comments or agreements.

Top issues raised by residents and stakeholders for streets within the LTN:

- Traffic congestion (47.9%)
- Personal safety (43.8)
- Crime and anti-social behaviour (45.7%)

Top issues raised by residents and stakeholders for the boundary roads surrounding the LTN:

- Traffic congestion (67.7%)
- Road safety (57.2%)
- Pollution (56.8 %)
- Noise (56.6%)

Overview of the respondent characteristics showed:

The younger and older generations were underrepresented in the CommonPlace survey. This could be due to limited knowledge or access to the internet in the much younger and older generation.

Men were also slightly underrepresented in the CommonPlace survey with 48 percent responding to the survey.

With regard to ethnicity, 5% of individuals described themselves as coming from an Asian, Asian British, background. When compared to the ward profile for the Bruce Grove West Green LTN area, there was an over-representation of White British individuals participating in the process, and an under-representation of the White Other group, which is the largest in the ward.

Compared to the wider ward demographics, there was a slight overrepresentation of over 60s.

The Disabled and Carers survey ran between Friday 23rd August and Friday 20th September 2024. This focused specifically on disabled people and carers, with paper copies also sent to the Blue Badge holders and various representative groups in the area. Comments that were specific to the Bruce Grove West Green LTN had an overall negative sentiment. The most common themes raised by those expressing a negative view were as follows:

- Feeling negative about the trial LTN (59.4%)

Bruce Grove West Green LTN	Agree	Neutral	Disagree	Don't know	Base
It is easier to cycle, use an adapted cycle or mobility scooter	7.1	22.1	36.0	34.7	308
It feels safer using the street in the day (road safety)	12.6	20.1	47.2	20.1	318
It feels safer using the street in the night (road safety)	9.5	18.4	50.8	21.3	315
It is easier to walk, use a walking chair or wheelchair	10.5	20.1	46.0	23.3	313
It is easier for me to make the trips I need to make	12.4	14.9	56.2	16.5	322
It is easier for me to get to local shops and services	11.5	15.6	56.4	16.5	321
It has made me take fewer trips by car	15.2	22.0	46.3	16.5	322
It has made it easier for me to get to friends and family	11.5	13.4	60.4	14.6	321
I feel safer using the street during the day (personal safety)	12.3	19.5	50.3	17.9	318
I feel safer using the street during the night (personal safety)	8.6	20.1	51.9	19.4	314
The area feels quieter (less noisy)	19.6	16.8	45.9	17.7	316
The air feels cleaner (less polluted)	12.7	18.8	48.4	20.1	314

--

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.

1. Sex

By increasing active travel and improving road safety, it is anticipated that women, who are currently underrepresented among cyclists, will feel more confident and increase uptake of active travel modes.

Women frequently travel as pedestrians, so delivering a network of pedestrian-friendly, low traffic streets via the LTN is expected to make choosing to cycle a great deal more comfortable for women. Over the long run, it is hoped that enabling residents who drive to leave the car at home more often will also help to reduce the congestion on main routes, which impacts on bus journeys and, as such, benefits women who tend to travel by bus more than men. Women are more likely to be primary carers for children and so it should be recognised that some may rely on motor vehicles to transport children regularly - for example, to access specialist educational settings outside of the immediate neighbourhood. In some cases, these trips may require re-routing or experience some variance in journey time (dependent on origin and destination). However, as described above, the aspiration is that more residents will choose alternative modes of transport over the long run, as has been observed in other LTNs across London, resulting in a reduction in congestion for the remainder of essential journeys.

Positive		Negative		Neutral impact		Unknown Impact	
----------	--	----------	--	----------------	--	----------------	--

2. Gender reassignment

The LTN is not expected to have any specific impact for those who have undergone or who are undergoing gender reassignment.

If any inequity in delivery is identified, steps will be taken to rectify this. It is unlikely that the introduction of an LTN will unduly impact gender reassigned people. However, this EqIA should be considered an iterative assessment document and should specific issues come to light they can be investigated, mitigation considered and actions recorded here.

Positive		Negative		Neutral impact		Unknown Impact	
----------	--	----------	--	----------------	--	----------------	--

3. Age

The LTN will benefit young people who may benefit from increased levels of active travel, reduced road danger from lower volumes of cars, and benefit in the long term from improved air quality in their neighbourhoods.

By improving the public realm and cleaner air, there is likely to be more social interaction which would lower the levels of social isolation that predominantly older people feel. Older people may also have greater confidence in accessing their neighbourhoods and crossing streets due to lower traffic volumes and decreased risk of road danger⁴¹ Safer road environments is especially beneficial for those with early dementia or Alzheimer's.

Positive		Negative		Neutral impact		Unknown Impact	
----------	--	----------	--	----------------	--	----------------	--

4. Disability

It is anticipated that those with a disability will benefit from the improved air quality that the LTN will bring, and from there being fewer cars on the road.

There may be negative impacts associated with restricting vehicle access to certain roads. However, this has been mitigated by allowing those with a Blue Badge an exemption to always drive through areas with operating LTNs without restriction.

Positive		Negative		Neutral impact		Unknown Impact	
----------	--	----------	--	----------------	--	----------------	--

5. Race and ethnicity

BAME communities in Haringey are more likely to live in areas with poor air quality.

Therefore, implementing the LTN will have a positive impact on BAME communities by improving air quality.

With a high proportion of black, Asian and non-white Londoners residents making sustainable journeys (walking and bus trips), the reductions in road danger and increased pedestrian priority associated with LTN projects will provide conditions that broadly benefit these groups. Black, Asian, and non-white Londoners, both adults and children, are twice as likely as white Londoners to be injured on the roads⁴². When we significantly increase the number of minor roads with infrequent motor vehicles movements, it is likely to benefit these groups and lead to changes in desirable changes in behavior. Furthermore, Black, Asian and ethnically diverse Londoners are also less likely than white Londoners to say that they feel safe from road collisions when walking

⁴¹ [What is a low traffic neighbourhood? - Sustrans.org.uk](http://www.sustrans.org.uk)

⁴² TfL Casualties in Greater London during 2014 <http://content.tfl.gov.uk/casualties-in-greater-london-2014.pdf>

around London at night (60% Black, Asian and ethnically diverse people compared with 74% white).

Positive		Negative		Neutral impact		Unknown Impact	
----------	--	----------	--	----------------	--	----------------	--

6. Sexual orientation

It is anticipated that making the LTN permanent will have a neutral impact on those whose sexual orientation is a protected characteristic. The LTN will not impact or affect this group in a different way to any other group.

Positive		Negative		Neutral impact		Unknown Impact	
----------	--	----------	--	----------------	--	----------------	--

7. Religion or belief (or no belief)

It is anticipated that the making the LTN permanent will have a neutral impact based on religion or belief, as there is no evidence they will disproportionately impact anyone because of their religion or belief.

Positive		Negative		Neutral impact		Unknown Impact	
----------	--	----------	--	----------------	--	----------------	--

8. Pregnancy and maternity

Implementing the LTN will have an overall positive impact on pregnant women. This is because poor air quality is more harmful to pregnant women.

There are also negative impacts associated with LTNs for pregnant women. This is because pregnant women are less able to undertake active travel and may have mobility issues. The Council will endeavour to ensure the LTN scheme does not result in disproportionately negative impacts for this group. LTNs do not restrict access to any particular destination. However, inconveniences may be faced by this group through experiencing longer travel times to their destination.

Overall, LTNs are a proportionate measure to achieve a legitimate aim, and the benefits associated with improved air quality are anticipated to outweigh any negative impacts.

Positive		Negative		Neutral impact		Unknown Impact	
----------	--	----------	--	----------------	--	----------------	--

9. Marriage and Civil Partnership

The LTN will have a neutral impact on marriage and civil partnership. People in a marriage or in a civil partnership will be impacted the same by this policy.

Positive		Negative		Neutral impact		Unknown Impact	
----------	--	----------	--	----------------	--	----------------	--

10. Groups that cross two or more equality strands e.g. young black women

Religious people with disabilities who need to access a place of worship via motor vehicle may be disadvantaged by the scheme. However, the policy on exemptions allows for enough leeway to grant exemptions in these cases. Religious organisations within or near the zone have been engaged and have had opportunities to request exemptions.

We know that certain transport inequalities exist in Haringey. In summary, LTNs promote active travel, improve air quality and have potential to reduce inequalities that affect protected groups including children and young people and BAME communities. However, some groups may not be able to benefit from engaging in active travel, including people with mobility-related disabilities, some older people, and pregnant people. These groups may be negatively impacted by reduction in private car use.

Outline the overall impact of the policy for the Public Sector Equality Duty:

- Could the proposal result in any direct/indirect discrimination for any group that shares the relevant protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a relevant protected characteristic and those who do not?

This includes:

- a) Remove or minimise disadvantage suffered by persons protected under the Equality Act
- b) Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
- c) Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low
- Will the proposal help to foster good relations between groups who share a relevant protected characteristic and those who do not?

- No. There will be no direct discrimination as a result of the LTN. Each LTN scheme will be unique and any issues that are identified will be assessed on a case-by-case basis.
- Most of the protected groups are experiencing the negative impacts of poor air quality at a disproportionate rate and therefore LTN will provide an overall positive.
- Those belonging to a protected group, such as disabled residents, will be accommodated by the LTN scheme and their access to their residence will not be negatively impacted.

- In all instances, where a penalty charge notice (PCN) is issued to a vehicle that contravenes the traffic restriction, there is a formal appeals process in place. This allows motorists to challenge the PCN if they believe an exemption applied or that there are mitigating circumstances that need to be considered.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EqlA guidance

Outcome	Y/N
No major change to the proposal: the EqlA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.</u>	Yes
Adjust the proposal: the EqlA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below	No
Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	No

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty

Impact and which relevant protected characteristics are impacted?	Action	Lead officer	Timescale
Disabled residents	Continue to issue exemptions to Blue Badge holders who require access into the LTN Support disabled individuals in the LTN to apply for Blue Badges if they do not already have one.	Highways and Parking	Ongoing

Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.

Those who have a Blue Badge will maintain access subject to issuance of an exemption which can be applied for.

In all instances, where a penalty charge notice (PCN) is issued to a vehicle that contravenes the traffic restriction, there is a formal appeals process in place. This allows motorists to challenge the PCN if they believe an exemption applied or that there are mitigating circumstances that need to be considered.

Therefore, the other groups with protected characteristics who will have their access restricted will not be negatively impacted in a disproportionate or discriminatory way. All groups also stand to benefit from the improvements of air quality and road safety, which often disproportionately affects people with protected characteristics.

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

- **Number of Blue Badge Users applying for exemptions.** This will ensure that communications to road users within / using the LTN are aware of exemptions that they can apply for.
- **Concerns raised by residents on exemptions.** To ensure that all communications highlights that those with mobility concerns are aware of exemptions.
- **Air quality levels.** The Council will continue to monitor air quality levels inside and outside the LTN

7. Authorisation

EqlA approved by

Mark Stevens
Assistant Director of Resident Experience

Date

29th November 2024

8. Publication

Please ensure the completed EqlA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EqlA process.